

5/30/2021

Gmail - Fwd: 18-cv-0030: Wang, et al. v. Gold Mantis, et al. -- (Modified) Proposed Order re Motion for Order to Show Cause against Lijie...



Exhibit 1

Howyo Chi <howyodoing@gmail.com>

Fwd: 18-cv-0030: Wang, et al. v. Gold Mantis, et al. -- (Modified) Proposed Order re Motion for Order to Show Cause against Lijie Cui

Juan Lizama <lizama2008@gmail.com>
 To: Howyo Chi <howyodoing@gmail.com>

Sat, May 29, 2021 at 10:35 AM

Chi,

To respond to Aaron's demand, this will require a lot of legal work.

Yesterday, we discussed with Mr. Mo the urgency for IPI to start intervening to ensure that not just Ms. Cui's interest is to be protected but also IPI's, especially as the court already issued a decision and judgment.

I see myself in a conflicted situation representing Ms. Cui individually and while I am Ms. Cui's attorney, I also have representation role with IPI in the Wang case as I have played some role in IPI's other matters.

We need to meet with Ms. Cui and to explain to her the need for her to hire another attorney that she feels comfortable representing her. For my office to represent her further in the new filing by Aaron, we need to be aggressive more and stop the harassment on her. We need to file protective order jointly with IPI. And this will involve over 50 hours of attorney and associates time for research and legal drafting.

Let me know if we can meet Monday.

jtl

----- Forwarded message -----

From: Aaron Halebua <aaron.halebua@gmail.com>

Date: Fri, May 28, 2021 at 11:00 AM

Subject: 18-cv-0030: Wang, et al. v. Gold Mantis, et al. -- (Modified) Proposed Order re Motion for Order to Show Cause against Lijie Cui

To: USDCNMI <usdcnmi@nmid.uscourts.gov>, bruce berline <bberline@gmail.com>, Michael Dotts <mdotts@dottslaw.law>, Juan Lizama <lizama2008@gmail.com>

To Whom It May Concern,

Please find attached the modified proposed order in connection with Plaintiffs' status report (ECF No. 324) filed today requesting that the Court issue an order to show cause why Ms. Cui should not be held in contempt.

Sincerely,
 Aaron Halebua

 Aaron Halebua
 Aaron Halebua, PLLC
 524 Broadway, 11th Floor
 New York, NY 10012
 T: (646) 854-9061
 E: ah@aaronhalebua.com / aaron.halebua@gmail.com
 W: www.aaronhalebua.com

2 attachments

2021.05.28 - 324 - Status Report on Cui's Noncompliance with Preservation Order.pdf
 603K

18-cv-0030 - Plaintiffs' Motion for Order to Show Cause against Cui - PROPOSED ORDER (modified

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2021.05.28).doc

55K

5/30/2021

Gmail - Fwd: 18-cv-0030: Affidavit/declaration by Ms. Cui



Exhibit 2

Howyo Chi <howyodoing@gmail.com>

Fwd: 18-cv-0030: Affidavit/declaration by Ms. Cui

2 messages

Juan Lizama <lizama2008@gmail.com>
 To: Howyo Chi <howyodoing@gmail.com>

Tue, May 25, 2021 at 8:37 AM

Chi,

Read the Aaron's letter carefully and let's meet and talk about it. We need to do this by tomorrow. Seems good news, Manglona's Order was far less than expected in th Wang case. jtl

----- Forwarded message -----

From: **Aaron Halegua** <aaron.halegua@gmail.com>
 Date: Thu, May 20, 2021 at 2:25 PM
 Subject: 18-cv-0030: Affidavit/declaration by Ms. Cui
 To: Juan Lizama <lizama2008@gmail.com>, bruce berline <bberline@gmail.com>, Times Wang <twang@northriverlaw.com>

Dear John,

We are in receipt of the declaration by Ms. Cui and Mr. Chi alleging that Ms. Cui's original SIM card was lost by the employees of IT&E on May 10, 2021. Putting aside the myriad of questions and problems raised by this allegation, these declarations are insufficient. The Court ordered that Ms. Cui (herself) is to provide a declaration that responds to the multiple questions outlined in Plaintiffs' modified proposed order, not only the lost SIM card. Indeed, as recorded in the minute entry for the hearing (ECF No. 320): "Court ordered Ms. Cui Lijie to sign an affidavit as to information regarding the tendered cell phone and SIM cards and to include information explaining what happened to her Chinese SIM card." The declarations you provided only discuss the lost SIM card.

For your convenience, I am attaching the proposed order that was submitted to the Court prior to last week's hearing. The declaration by Ms. Cui addressing the subjects outlined therein should have been provided on May 19 at 5:00pm. Obviously, this was not done. Plaintiffs would prefer that the declaration be provided immediately. However, since Plaintiffs expect Ms. Cui to do a careful and thorough job in drafting the declaration, Plaintiffs request that the declaration be provided by 5:00pm on May 21.

Sincerely,
 Aaron Halegua

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 **18-cv-0030 - Plaintiffs' Motion for Order to Show Cause against Cui - PROPOSED ORDER (modified 2021.05.12).doc**
 54K

Howyo Chi <howyodoing@gmail.com>
 To: Juan Lizama <lizama2008@gmail.com>
 Cc: Ray Yumul <raynyumul@gmail.com>, "remycmafnas@gmail.com" <remycmafnas@gmail.com>

Wed, May 26, 2021 at 10:38 AM

Dear Mr Lizama,

5/30/2021

Gmail - Fwd: 18-cv-0030: Affidavit/declaration by Ms. Cui

Thank you for sending me on 25 May 2021 the email message from Mr Aaron Halegua dated 20 May 2021, which set out a deadline for Ms Cui to reply to the "modified proposed order" before 5 pm on 21 May 2021.

Ms Cui is surprised that she has never been notified of any of such request. Nor has she been informed of the existence of this "modified proposed order" and the multiple questions to be answered!

This is an urgent matter. As her lawyer, please let her know immediately the followings:

1: when did you receive first time this modified proposed order?

2: why you did not send it to her before 21 May 2021? And why you only let her know this four days late after the passing of the deadline set by Mr Aaron Halegua?

3: what will happen this time to Miss Cui? Contempt of court again?

4: Miss Cui requests you to take immediate action to talk to Aaron to explain this situation and to request a new deadline for providing answers to the multiple questions. Ms Cui is happy to reply to all questions truthfully and timely.

5: Miss Cui also needs your advice on whether this modified proposed order is enforceable by law.

Looking forward to your immediate attention to this urgent matter!!!

Chi (on behalf of Ms Cui)

[Quoted text hidden]